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**REMARKS**

As stated above, Applicants appreciate the Examiner's thorough examination of the subject application and request reexamination and reconsideration of the subject application in view of the preceding amendments and the following remarks. The Applicants have carefully reviewed and considered the Office Action mailed on December 27, 2005, and the references cited therewith.

Presently, claims 35-43 are pending. Independent claims 35, 38 and 41 have been amended; claim 37 has been canceled; as a result, claims 35, 36, 38-41 are still pending in this application. Independent claims 35, 38 and 41 have been amended to clarify the Applicants' invention. In particular, independent claims 35 and 41 have been amended such that a key press or hook state commands are received over an asynchronous digital link. Independent claim 38 has been amended as suggested by the Examiner.

Concerning Item 1 of the subject action, the Examiner rejects claim 38 under 35 USC §112, second paragraph, as being incomplete for omitting essential elements amounting to a gap between elements. In particular, the Examiner suggests that the term "and events" should be inserted after the two occurrences of the term "information".

Independent claim 38 has been amended as suggested by the Examiner.

Concerning Items 2 and 3 of the subject action, the Examiner rejects claims the Examiner rejects claims 35-43, under 35 USC §103(a), as being unpatentable by Goldman et al. (U.S. Published Patent Application US 2005/0249198 A1; hereinafter Goldman) in view of Macleod Beck et al. (U.S. Patent No. 6,170,011 B1; hereinafter Macleod Beck).

The Examiner points to Goldman as disclosing a system and method for bridging a POTS network and a packet network. The Examiner points to Goldman's system as including an interface to connect to a synchronous digital link and to send and receive digital signals to and from a telephone switch over the synchronous digital link (142 of fig. 1). The Examiner also points to Goldman as disclosing a controller to generate graphical display information and events based on the digital signals received over the interface (140 of fig. 1). The Examiner also points to Goldman as disclosing logic to communicate over an asynchronous digital link, to convert the digital signals to an asynchronous format, and to transmit the digital signals over the asynchronous digital link (141, 132 of fig. 1).

The Examiner concedes that Goldman does not specifically disclose an asynchronous format that contains graphical display information and events. The Examiner then points to Macleod Beck as disclosing a method and apparatus for determining and initiating interaction directionally within a multimedia communication center comprising asynchronous format containing graphical display information and events (paragraph 0253). The Examiner considers that it would have been obvious to one skilled in the art to use graphical display information and events in asynchronous format as taught by Macleod Beck in the system of Goldman in order to provide computer enhancement to the server.

Applicants' amended independent claim 35 is directed to an apparatus requiring:

an interface to connect to a synchronous digital link and to send and receive digital signals to and from a telephone switch over the synchronous digital link;

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a controller to generate graphical display information and events based on the digital signals received over the interface; and

logic to communicate over an asynchronous digital link, to convert the digital signals to an asynchronous format, and to transmit the digital signals and the graphical display information and events over the asynchronous digital link, the logic is arranged to receive key press or hook state commands over the asynchronous digital link, the logic is arranged to receive key press or hook state commands over the asynchronous digital link.

Applicants' amended independent claim 38 is directed to a method requiring:

receiving digital data from a public branch exchange (PBX) over a synchronous digital communication link;

generating graphical display information and events based on the received digital data;

transmitting the graphical display information and events over an asynchronous Internet protocol (IP) link;

receiving a key press or hook state command over the asynchronous Internet protocol (IP) link;

translating the key press or hook state command to a different format; and

transmitting the translated key press or hook state command to the PBX over the synchronous digital communication link.

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Applicants' amended independent claim 41 is directed to a machine-accessible medium that includes instructions, which when executed, cause a machine to:

convert received light events and display updates to a graphical format;

cause a first display device to display a digital telephone including the light events and display updates;

convert received input device data that is related to the displayed digital telephone into a packetized format, wherein the input device data includes a key press or hook state commands; and

transmit the packetized input device data over an asynchronous Internet protocol (IP) link.

Amended independent claims 35, 38 and 41 each include receiving a key press or hook state command over the asynchronous Internet protocol (IP) link. Once received, the key press or hook state commands may be translated for graphical representation and/or for use with a private telephone switch (e.g., a private branch exchange (PBX)). In this regard, the subject application reads:

"In the system illustrated in Fig. 2, PBX 12', PC 20', mouse 22', digital phone emulation interface 34' and application program interface 36' are similar to the corresponding components in the system 10 of Fig. 1. In the system of Fig. 2, some of the control components are actually the same C++ object, but behave differently based on whether the control is configured as the client or as the server. For this reason, the following description is separated into client and server sections. The components within the broken line region 50 all reside within the same control which has methods, properties and events which will be described in further detail presently.

The server control object 54 is responsible for the following functions. Object 54 translates VoiceBridge light events and display updates from the VoiceBridge Thread 56 into graphical user interface (GUI) representations of these events for display on a server monitor 58. The GUI representation 60 is a soft phone that looks like the actual digital station set that the VoiceBridge interface 34' emulates. In this implementation, the soft phone provides a mirror image of what the client is seeing on his/her PC 20'. The mirror image is a means to provide status of client activity.

Server control object 54 also translates key press and hook state commands from the TCP/IP Socket Thread 62 into GUI representations of these commands for display on the server monitor 58. This completes the mirror image described above. Object 54 translates key press and hook state commands from the TCP/IP Socket Thread 62 into VoiceBridge API commands for execution and interaction with the PBX 12'. Object 54 also translates VoiceBridge light events and display updates for subsequent packetization by the TCP/IP Socket Thread 62.

The TCP/IP Socket Thread 62 has the following responsibilities when the control 50 is acting as a server. It packetizes light events and display updates from the Server Control Object 54 for transmission over a socket to the client, and it accepts packetized key press and hook state commands and submits them to the Server Control Object 54 for execution using VoiceBridge API Commands or display on the GUI. The VoiceBridge Event Thread 56 is responsible for monitoring the VoiceBridge event Queue for incoming light events and display changes using the VoiceBridge API 36' and submitting these events to the Server Control Object 54 for further processing" (Page 6, first full paragraph through Page 7, second full paragraph; emphasis added).

Thus, key press and hook state commands may be received and translated to provide access to features of a digital telephone without a physical telephone set.

Goldman is understood to be directed to a system for bridging between a Plain Old Telephone Service (POTS) network and a packet network such as the Internet. However, Goldman is not understood to disclose or suggest receiving key press or hook state commands over an asynchronous digital link. Furthermore, the reference is not understood to disclose or suggest that upon receipt, the key press or hook state commands may be translated for graphical representation or for use with a private telephone switch (e.g., a private branch exchange (PBX)).

The Examiner appears to suggest that paragraph 0036 of Goldman discloses logic that may be arranged to receive key press or hook state commands over an asynchronous digital link.

This cited background portion of Goldman reads:

#### "2. HOHO Servers

As packet telephony grew in popularity, the need to call people who did not have access to the packet network led to the creation of Hop-on Hop-Off (HOHO) servers. The development of Hop-on Hop-Off servers provided a mechanism for PC-initiated telephone calls on a packet network to connect with the POTS network and terminate at a customer's telephone handset or vice-versa. The HOHO or server brings the packet network and POTS network together at a common gateway interface, which bi-directionally converts IP packets into voice and signaling information, such as the sequence of messages used to set up, bridge, and tear down calls. In this way, voice communication is established across the packet and POTS networks." (Paragraphs 0035 and 0036)

This cited portion of Goldman is not understood to disclose or suggest logic that is arranged to receive key press or hook state commands over an asynchronous digital link, as required by Applicants' amended independent claims 35, 38 and 41.

Macleod Beck is understood to describe an enterprise-hosted, multimedia call center for monitoring business campaigns where agents initiate contact with customers. By monitoring the campaigns, particular events may be detected. For example, monitoring agent activities may indicate when certain agents are not completely being utilized. In this regard, Macleod Beck reads:

"Arguably, one of the more desirable goals that may be achieved in any multimedia communication center is to maintain a state wherein all of engaged agents, knowledge workers, and other enterprise personnel are kept optimally busy at all times. One of the methods employed in this regard involves launching out-bound campaigns wherein agents initiate contact with customers, especially when monitoring of agent activity indicates that certain agents are not fully engaged.

There will invariably be periods during communication center operation where business is slow and all agents are not engaged actively with customers. A time such as this is often utilized for out-bound calling or the like." (Col. 4, lines 10-23)

Thus, while Macleod Beck is understood to describe an enterprise-hosted, multimedia call center, the reference is not understood to disclose or suggest logic that is arranged to receive key press or hook state commands over an asynchronous digital link. These features of the claimed invention enable, for example, a telephone communications system that provides access to all the features of a digital telephone without a physical telephone set.

Accordingly, Applicants respectfully submit that amended independent claims 35, 38 and 41 are allowable over the combination of Goldman and Macleod Beck.

The remaining claims of this rejection depend directly or indirectly upon Applicant's invention of amended independent claims 35, 38 and 41, and thus must be read as incorporating

the limitations of the respective independent claims. (35 USC §112, 4<sup>th</sup> paragraph). Since nowhere does the combination of Goldman and Macleod Beck disclose or suggest these limitations of amended independent claims 35, 38 and 41, it is respectfully submitted that the Examiner's rejection of claims 36, 39, 40, 42 and 43 as being unpatentable over Goldman in view of Macleod Beck is in error, and should be withdrawn.

Having dealt with all the objections raised by the Examiner, it is respectfully submitted that the present application, as amended, is in condition for allowance. Thus, early allowance is earnestly solicited. The Examiner is invited to telephone Applicants' attorney (603-668-6560) to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 50-2121.

Respectfully submitted,


EDWIN DYLAG ET AL.

By their Representatives,

Customer No. 45459

603-668-6560

Date 4/27/06

By   
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**CERTIFICATE UNDER 37 CFR 1.8:** The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on this 27 day of April, 2006.

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